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Admitted to Practice Law
in the State of New York

May 24, 2022

Via Regular Mail and Email: steven.moser@moserlawfirm.com

Steven J. Moser, Esq.
Moser Law Firm, P.C.
5 E. Main Street
Huntington, New York 11743

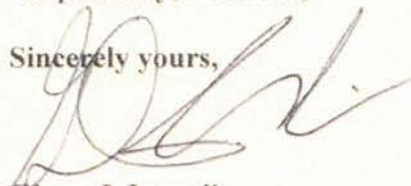
Re: Jonatan Barahona and Hector Hernandez v. Paradise Tree
Service & Landscape, Corp. and William Nieto
Venue: United States District Court, Eastern District of New York
Civil Action No.: 2:21-cv-05400 (GRB)(AYS)

Dear Mr. Moser:

Regarding the above matter, please find enclosed herein a copy of the Defendants' 2018, 2019 and 2020 Federal and State Income Tax Returns, including Schedule K-1s. These returns indicate that my clients do not meet the \$500,000.00 threshold as required by F.L.S.A. Moreover, your client's, Jonatan Barahona's claims under F.L.S.A. are time-barred, as you acknowledged at our good faith meet and conference on May 12, 2022. Please withdraw all F.L.S.A. claims on behalf of both your client's due to Income Threshold and/or Statute of Limitations defenses.

Respectfully, I remain,

Sincerely yours,



Glenn J. Ingoglia
GJI/vv
Encls.